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Counsel for Defendant

FOR THE DISTRICT OF OREGON PORTLAND DIVISION

UNITED STATES OF AMERICA,

CR No. 3:22-cr-00236-SI-1

PLAINTIFF,

٧.

DECLARATION IN SUPPORT OF MOTION TO CONTINUE TRIAL DATE

JELEN JONES,

DEFENDANT.

- I, Anthony C. Schwartz, declare:
- 1. I am the attorney appointed to represent Mr. Jones in the above entitled case.
- 2. The trial is scheduled for September 6, 2022.
- 3. The defense has received discovery, and continues to conduct investigation into the case including obtaining information related to the circumstances of the offense and Mr. Jones's background. This information relates to pretrial litigation, trial, and sentencing. However, more time is needed to adequately and reasonably prepare for

plea and/or trial and sentencing. The defense therefore respectfully requests that this Court continue his case for a period of about <u>180 days</u> to accomplish these tasks.

- 4. I have discussed with Mr. Jones his right to a speedy trial. He agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7) and § 3164 of the Speedy Trial Act.
- 5. AUSA Singh has no objection to this motion.

DATED this August 26, 2022

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

> <u>s/Anthony C. Schwartz</u> Anthony C. Schwartz